it, it should be removed to a level of 50ppt* which should be a reasonable limit of detection for laboratories. (This would not be necessary if it can be demonstrated that animals have not been contaminated.)

6. It should also be determined whether milk and eggs from the Erwin farm contain TCDD and whether the farm family consumed these products.

7. Unless there is evidence that contaminated soil is migrating out of fill area of the road, this material could be left (TCDD adheres to soil). However, further construction crews would have to be warned of the hazardous material under the road and the area should be posted.

8. It is assumed that workers engaged in sampling or otherwise handling TCDD contaminated material will use procedures and protective gear as outlined by NIOSH.

9. It is not clear from the information provided by EPA whether the soil that may have to be removed will be incinerated. This would be possible if only small amounts are involved. However, large amounts might have to be stored at a safe site. If such a site does not exist, removal and concentration of the material in one place might increase the hazard.

*Analytically we believe the number of 50ppt represents a value which (1) a sufficient number of laboratories will be adequately able to measure, (2) may prevent unnecessary excavation in the State of Missouri and, (3) provides a reasonable margin of safety until more definitive epidemiologic information is available.

Summary

Further information including extent of the contamination (possibly outlined on a map) is needed to determine what soils and sediments should be removed. In general, in remote areas which are not adjacent to surface or ground water, ppb levels of TCDD could be left. However, in some situations such as the Erwin farm, clean up would have to proceed to the ppt level. If contamination is extensive, this may not be feasible. In such situation, the most highly contaminated areas with the greatest potential for human exposure should be addressed first.

References

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